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9   *Attorneys for Defendant Bank of America, N.A.*

10   **UNITED STATES DISTRICT COURT**

11   **DISTRICT OF NEVADA**

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14 RICHARD ZEITLIN, ADVANCED   Case No.: 2:18-cv-01919-RFB-DJA
    TELEPHONY CONSULTANTS, MRZ
15 MANAGEMENT, LLC, DONOR   **STIPULATION AND ORDER**
    RELATIONS, LLC, TPFE, INC., AMERICAN   **EXTENDING DEADLINE FOR**
16 TECHNOLOGY SERVICES, COMPLIANCE   **BANK OF AMERICA'S**
    CONSULTANTS, CHROME BUILDERS   **OPPOSITION TO PLAINTIFFS'**
17 CONSTRUCTION, INC., and UNIFIED   **OBJECTION TO ORDER DENYING**
    DATA SERVICES,   **MOTION TO COMPEL**

18   Plaintiffs,   **(SECOND REQUEST)**

19 v.

20 BANK OF AMERICA, N.A., and JOHN and
    JANE DOES 1-100,
21
22   Defendants.

23

24   Pursuant to Local Rule IA 6-1, Plaintiffs Richard Zeitlin, Advanced Telephony

25 Consultants, MRZ Management, LLC, Donor Relations, LLC, TPFE, Inc., American Technology

26 Services, Compliance Consultants, Chrome Builders Construction, and Unified Data Services

27 ("Plaintiffs") and Defendant Bank of America, N.A. ("BANA" and together with Plaintiffs the

28 "Parties" and each a "Party"), through their counsel of record hereby stipulate to extend the

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4850-6190-1771

1   deadline for BANA to file its Opposition to Plaintiffs' Objection to Magistrate Judge Albregts'

2   Order Dated August 10, 2020 (ECF No. 78) (the "Objection") from September 15, 2020 to and

3   through September 22, 2020. The Objection was filed on August 24, 2020. The Parties

4   respectfully request the Court enter this Stipulation as an Order.

5   The reason for this extension is to allow BANA additional time to analyze and respond to

6   Plaintiffs' Objection, which raises a number of complex legal issues. The Parties agree that this

7   constitutes good cause to extend the deadline as requested herein and that the extension will not

8   prejudice any Party. This is the Parties' second request for the extension of the deadline.

9   The Parties' first request was submitted by Stipulation on September 9, 2020 (ECF No.

10 79). That Stipulation has not yet been entered as an Order. The Parties respectfully request that, if

11 the Court finds it to be appropriate, the first Stipulation be withdrawn, and this Stipulation be

12 entered in its stead.

13 **IT IS SO STIPULATED**.

14 Dated: September 14, 2020   DATED: September 14, 2020

15 THE BERNHOFT LAW FIRM, S.C.   SNELL & WILMER L.L.P.

16   */s/ Robert G. Bernhoft (with permission)*   */s/ Kiah D. Beverly-Graham*
17 Robert G. Bernhoft, Esq.   Amy F. Sorenson, Esq.
    Admitted *Pro Hac Vice*   Nevada Bar No. 12495
18 Wisconsin Bar No. 1032777   Blakeley E. Griffith, Esq.
    Thomas E. Kimble, Esq.   Nevada Bar No. 12386
19 Admitted *Pro Hac Vice*   Kiah D. Beverly-Graham, Esq.
    Illinois Bar No. 6257935   Nevada Bar No. 11916
20 Daniel James Treuden, Esq.   3883 Howard Hughes Parkway, Suite 1100
    Wisconsin Bar No. 1052766   Las Vegas, NV 89169
21 1402 E. Cesar Chavez Street   *Attorneys for Defendant Bank of America,*
22 Austin, Texas 78702   *N.A.*

23   IT IS FURTHER ORDERED that [79] Stipulation
    Joel F. Hansen, Esq.   for extension is denied as moot.
24 Nevada Bar No. 1876   IT IS SO ORDERED:
    Hansen & Hansen, LLC
25 9030 W. Cheyenne Avenue, #210
    Las Vegas, Nevada 89129
26 *Attorneys for Plaintiffs*

27   _____
                                                   RICHARD F. BOULWARE, II
28   UNITED STATES DISTRICT JUDGE

                                                   - 2 - DATED this   15th day of September, 2020.

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ORDER

2   **IT IS SO ORDERED.**

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4   _____
    UNITED STATES DISTRICT COURT JUDGE

5   DATED: _____

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CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing **STIPULATION AND ORDER EXTENDING DEADLINE FOR BANK OF AMERICA'S OPPOSITION TO PLAINTIFFS' OBJECTION TO ORDER DENYING MOTION TO COMPEL (SECOND REQUEST)** with the Clerk of the Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED: September 14, 2020

 /s/ Lara J. Taylor
An Employee of Snell & Wilmer L.L.P.

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